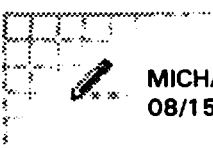


167858



MICHAEL MCATEER
08/15/2000 10:36 AM

To: DMLIGH cc: Thomas Martin, epa4213, timothy.p.gouger, KEVIN TURNER
Subject: Re: Sediments Removal UAO - Effect on AOC

Mike:

I received your request to drop the requirements for conducting an alternatives evaluation and an ecological assessment of Dead Creek Segments CS-B, CS-C, CS-D, CS-E and Site M. In light of the fact that Solutia has agreed to conduct the removal action in Dead Creek under the Unilateral Order dated May 31, 2000, U.S. EPA agrees that the alternative evaluation and ecological assessment for these areas of Dead Creek under the EE/CA and RI/FS Order are unnecessary at this time. Therefore, those requirements under the Order for the EE/CA and RI/FS relating to the alternatives evaluation and ecological assessment for Dead Creek (except for Segment F and the Borrow pit) are suspended at this time.

Please note that should the exit sampling during the removal action show elevated concentrations of contaminants remaining in Dead Creek, then the requirements for conducting the alternatives evaluation and the ecological assessment may be re-imposed under the EE/CA and RI/FS Order. Also, should Solutia cease its compliance with the UAO for the Creek removal before its completion, then all requirements under the EE/CA and RI/FS Order will put back into effect.

Please call me if you have any questions.

Mike McAteer
Remedial Project Manager

DMLIGH@solutia.com on 08/11/2000 07:45:00 AM



DMLIGH@solutia.com on 08/11/2000 07:45:00 AM

To: MICHAEL MCATEER

Mike,

In discussion with the Sauget Team yesterday working on preparation of the AOC EECA / RIFS, a question was raised about the practical effect of the Solutia / USEPA agreement to remove the sediments in Sectors B, C, D & E under the Sediments Removal UAO. Since the sediments will either no longer be in the creek bed, or will be in the process of being removed when the AOC EECA is completed, this would seem to us to obviate the need for the following activities now required by the AOC:

The ecological risk assessment and the alternatives analysis for the

sediments in Sectors B, C, D & E.

Sediments unaffected by the UAO Work - Sector F and the Borrow Pit - would not be affected and would still be dealt with as originally defined in the AOC.

If you are in agreement to drop the AOC requirements relevant to the sediments to be removed pursuant to the Sediments Removal UAO, I will document that decision in the next monthly report for the record.

Thanks,
Mike